



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

ANDREW M. CUOMO
Attorney General

212-416-6295

LESLIE G. LEACH
Executive Deputy Attorney General
Division of State Counsel

JUNE DUFFY
Assistant Attorney General in Charge
Litigation Bureau

June 6, 2008

BY FACSIMILE
Honorable Victor Marrero
United States District Judge
United State Courthouse
Southern District of New York
500 Pearl Street, Suite 660
New York, New York 10007

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED 6-9-08 ✓

Re: Pedro Bridgewater v. Taylor, et al. / 08 Cv. 3593 (VM)(HBP)

Dear Judge Marrero:

This Office represents defendant correction officer J. Taylor in this matter. Upon information and belief and pursuant to the docket sheet in this case, defendants Merrith, Traylor, Guobadia, Dorsey, Wilson and Fischer have not yet been served with the summons and complaint and have not yet requested representation from this Office pursuant to New York State Public Officers Law § 17. If and when they are served, they will join in this request for an extension. Although the docket sheet indicates that the New York State Department of Correctional Services was served by mail on May 22, 2008, this Office has not yet received a request for representation on the agency's behalf.

Defendant Taylor was served by mail on May 20, 2008. Accordingly, an answer is due on June 9, 2008. I write to respectfully request an extension of time by which defendant Taylor must move or answer with respect to the complaint until August 8, 2008. This is defendant's first request for an extension of time. Plaintiff pro se has not been contacted for his consent as he is presently incarcerated.

At this time, defendants believe that a motion to dismiss may be appropriate as to several of the defendants. Accordingly, in light of the fact that defendants will be moving to dismiss, defendants request a stay of discovery pending a decision on the motion.

Honorable Victor Marrero

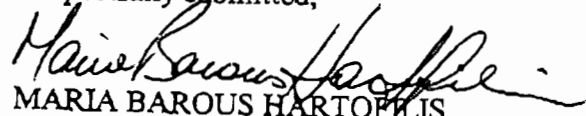
Pedro Bridgewater v. Taylor, et al. / 08 Cv. 3593 (VM)(HBP)

2

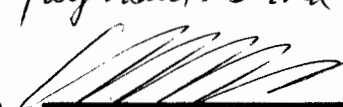
An extension of time is necessary in order to obtain the necessary files and documents, investigate the facts, research applicable law and draft responsive papers. The additional time may also allow for the remaining defendants to be served and request representation so that a joint motion or answer may be filed on their behalf.

Wherefore, it is respectfully requested that defendant Taylor's time to move or answer with respect to the complaint be extended to August 8, 2008 and that all discovery be stayed pending a decision on the motion.

Respectfully submitted,


MARIA BAROUS HARTOPLIS
Assistant Attorney General

cc: Pedro Bridgewater
Plaintiff - Pro Se
By first class mail

Request GRANTED. The time for defendant(s) to answer or otherwise move with respect to the complaint in this action is extended to <u>8-8-08</u>	
as to any defendant(s) served	
SO ORDERED.	
<u>6-10-08</u>	
DATE	VICTOR MARRERO, U.S.D.J.